

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RONALD GEATHERS,

Plaintiff,

vs.

BANK OF AMERICA, N.A.,

Defendant.

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CIVIL ACTION

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FILE NO.: 14-CV-00850-WSD-AJB

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**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT BANK OF AMERICA, N.A.'S MOTION TO DISMISS FOR  
FAILURE TO STATE A CLAIM**

Plaintiff, RONALD GEATHERS, hereby moves the Court pursuant to Federal Rules of Civil Procedure 6(b) and 12(a) to extend, until May 15, 2014, the date to oppose the Defendant's Motion to Dismiss for Failure to State a Claim. Plaintiff was previously proceeding *pro se* and respectfully requests this extension in order to allow newly hired counsel the opportunity to fully review said motion and to prepare an adequate response to same.

This 28<sup>th</sup> day of April, 2014.

[Signature appears on following page]

/s/Natalie R. Rowland

Natalie R. Rowland

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATION**

The undersigned hereby certifies that the within and foregoing **PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT BANK OF AMERICA, N.A.'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM** was prepared using Times New Roman 14-point font in accordance with LR 5.1(B).

This 28<sup>th</sup> day of April, 2014.

/s/Natalie R. Rowland

Natalie R. Rowland

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2014, I served the within and foregoing **PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT BANK OF AMERICA, N.A.'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

ANDREW G. PHILLIPS  
PAUL A. ROGERS  
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/s/Natalie R. Rowland  
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